

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :
Vivian Woodbury : Chapter 13
: :
: :
Debtor : Case No.: 20-13995AMC

**EXPEDITED MOTION TO REINSTATE THE AUTOMATIC STAY WITH
REGARD TO COMPU-LINK CORPORATION D/B/A CELINKAS SERVICER
FOR PHH MORTGAGE CO.**

The Debtor hereby respectfully requests this Honorable Court to reinstate the automatic stay as to Compu-Link Corporation d/b/a Celink as Servicer for PHH Mortgage Co., and avers the following:

1. The Debtor filed the instant Chapter 13 Bankruptcy on or about October 6th, 2020.
2. Said Bankruptcy was issued case number 20-13995AMC.
3. Debtor resides at 6320 Cherokee Street, Philadelphia PA, 19144 (the “property”).
4. Debtor filed Chapter 13 in good faith, in an effort to save her home.
5. Debtor is elderly and infirmed with significant medical issues.
6. On or about November 4th, 2020 approximately one month after the case was filed, Compu-Link Corporation d/b/a Celink as Servicer for PHH Mortgage Co (“mortgagee”) filed for relief of the automatic stay.
7. Although Debtor’s Counsel made Debtor aware of the filing of this motion, Debtor did not realize the importance of the motion and did not contact Counsel in order to file an answer and timely defend this motion.
8. Because the motion was not defended, mortgagee was granted relief of Stay by default on November 25, 2020.

9. Debtor's Counsel then contacted Debtor's daughter, who has volunteered to be appointed "Next Friend" in Debtor's case, as Debtor is in need of assistance to ensure her Bankruptcy case can succeed.
10. A hearing on the Motion for Next Friend is set for December 15th, 2020 with the Honorable Court.
11. Debtor does not want to lose her family's home.
12. Debtor believes there to be significant equity in her home which she wishes to preserve.
13. Debtor has made payments in good faith toward her Chapter 13 Plan, wherein she intends to repay real estate taxes primarily owed to the mortgagee.
14. Debtor is additionally maintaining current homeowner's insurance on the property, and will remain current on real estate taxes moving forward in time.
15. Debtor has the financial support of her family, who are ready and able to contribute more to her if need be.
16. Debtor can propose a feasible Plan to make mortgagee whole if given the opportunity.
17. Debtor is also considering selling the property in order to realize the equity therein, and would be able to make the mortgagee whole at the time of sale.
18. It is humbly requested that an Expedited hearing be set on this Motion due the fact that a sheriff's sale of the Debtor's property is set for January 5, 2021.

WHEREFORE, the Debtor humbly requests that this Court grant Debtor's request for an expedited hearing, and reinstate the Automatic Stay as to Compu-Link Corporation d/b/a Celink as Servicer for PHH Mortgage Co.

Dated: December 11, 2020

/s/Brad J. Sadek, Esq.

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